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8 Attorneys for Defendant  
9 BIO-RAD LABORATORIES, INC.

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**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

GERMAN PANIAGUA,

Plaintiff,

v.

BIO-RAD CORPORATION, DOES 1-10,

Defendant.

No. C 06-00500 MHP

**STIPULATION AND [PROPOSED]  
ORDER SELECTING ADR PROCESS**

Counsel report that they have met and conferred regarding ADR and have reached the following stipulation pursuant to Civil L.R. 16-8 and ADR L.R. 3-5:

The parties agree to participate in the following ADR process:

**Court Processes:**

☐ Non-Binding Arbitration (ADR L.R. 4)    ☐ Early Neutral Evaluation (ENE) (ADR L.R. 5)    ☒ Mediation (ADR L.R. 6)

**Private Process:**

☐ Private ADR (please identify process and provider)

1 The parties agree to hold the ADR session by:

2 ☒ the presumptive deadline (the deadline is 90 days from the date of the order referring  
3 the case to an ADR process unless otherwise ordered.)

4 ☐ other requested deadline \_\_\_\_\_.

5  
6 Dated: April \_\_, 2006

HANSON BRIDGETT MARCUS VLAHOS  
& RUDY, LLP

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9 //s//<sup>1</sup>  
10 RAYMOND F. LYNCH  
11 Attorney for Defendant  
BIO-RAD LABORATORIES, INC.

12 Dated: April \_\_, 2006

13 //s//<sup>2</sup>  
14 DAVE LINN  
15 Attorney for Plaintiff  
16 GERMAN PANIAGUA  
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27 <sup>1</sup> I hereby attest that I have on file all holograph signatures for any signatures indicated by a  
"conformed" signature (/s/) within this efiled document.

28 <sup>2</sup> As of the time of this filing, defense counsel does not have a holograph signature from Mr. Linn.  
However, Mr. Linn reviewed this document and authorized it to be filed on his behalf.

1 [PROPOSED] ORDER

2 Pursuant to the Stipulation above, the captioned matter is hereby referred to:

- 3 ☐ Non-binding ADR
- 4 ☐ Early Neutral Evaluation (ENE)
- 5 ☒ Mediation
- 6 ☐ Private ADR

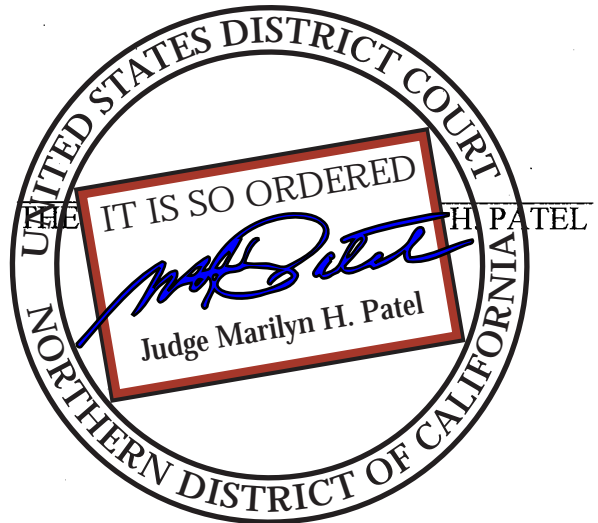
7 Deadline for ADR session:

- 8 ☒ 90 days from the date of this Order.
- 9 ☐ Other \_\_\_\_\_

10

11 IT IS SO ORDERED:

12 Dated: 4/11/2006 \_\_\_\_\_



**PROOF OF SERVICE****German Paniagua v. Bio-Rad Corporation**

I, Hillary Plymate, declare that I am a resident of the State of California. I am over the age of 18 years and not a party to the action entitled, *German Paniagua v. Bio-Rad Corporation*; that my business address is 425 Market Street, 26th Floor, San Francisco, CA 94105. On April 10, 2006, I served a true and accurate copy of the document(s) entitled:

**STIPULATION AND [PROPOSED] ORDER SELECTING  
ADR PROCESS**

on the party(ies) in this action by placing said copy(ies) in a sealed envelope, each addressed to the last address(es) given by the party(ies) as follows:

Dave Linn, Esq.  
Box 14268  
Berkeley, CA 94712

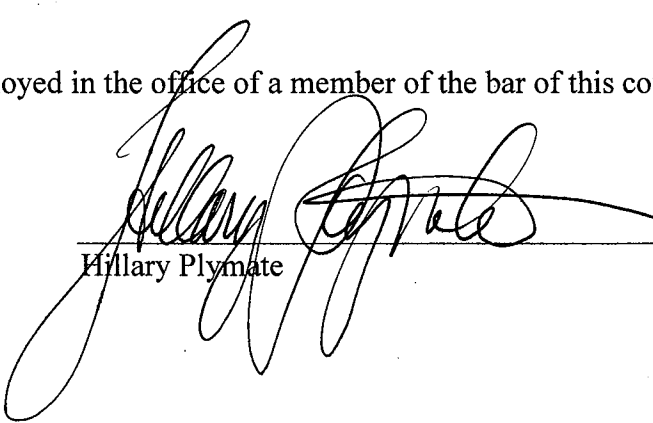


(By First Class Mail pursuant to Code of Civil Procedure section 1013.) I am readily familiar with (firm name)'s practices for collecting and processing documents for mailing with United States Postal Service. Following these ordinary business practices, I placed the above referenced sealed envelope(s) for collection and mailing with the United States Postal Service on the date listed herein at 425 Market Street, 26th Floor, San Francisco, California 94105. The above referenced sealed envelope(s) will be deposited with the United States Postal Service on the date listed herein in the ordinary course of business.



(By Telecopy Fax pursuant to Code of Civil Procedure section 1013.) I am readily familiar with (firm name)'s practice for processing of documents via Telefax. Following these ordinary business practices, I directed that the above referenced documents(s) be placed in the Telefax machine, with all costs of Telefaxing prepaid, directed to each of the party(ies) listed on the attached service list using the last Telefax numbers(s) given by the party(ies), and processed through the Telefax equipment, until a report is provided by that equipment indicating that the Telefax operation was successful. A copy of the Telefax report indicating successful transmission is attached hereto.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
Hillary Plymate